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## NOTES OF CASES.

**ACTIONS—ASSAULT—COUNTERCLAIM.**—One sued for assault committed in a continuous encounter is held, in *Gutzman v. Clancy* (Wis.), 58 L. R. A. 744, to have the right to counterclaim for injuries inflicted upon him by his adversary.

**CONSTITUTIONAL LAW—LICENSE TAX UPON VEHICLES.**—The imposition of a license tax upon vehicles used upon the streets of a city, which is to be expended in maintaining such streets, is held, in *Fort Smith v. Scruggs* (Ark.), 58 L. R. A. 921, to be constitutional.

**CONSTITUTIONAL LAW—STATUTE LIMITING HOURS OF WOMAN'S WORK.**—A statute limiting the hours of work of women in certain employments is held, in *Wenham v. State* (Neb.), 58 L. R. A. 825, not to infringe the constitutional rights of either employer or employee.

**CONSTITUTIONAL LAW—IMPAIRMENT OF OBLIGATION OF CONTRACTS—JUDGMENTS.**—Judgments are held in *Evans-Snider-Buel Co. v. McFadden* (C. C. App. 8th C.), 58 L. R. A. 900, not to be contracts, within the prohibition of the Federal Constitution of legislation tending to impair contracts.

**CONSTITUTIONAL LAW—DISCHARGE OF EMPLOYEE.**—A statute forbidding, under penalty, an employer to discharge an employee because he is a member of a labor organization, is held, in *State ex rel Zillmer v. Kreutzberg* (Wis.), 58 L. R. A. 748, to violate the constitutional guaranty of liberty.

**LIBEL—BASTARD—REPUTED PARENTAGE OF.**—A clergyman who enters upon the baptismal record of his church the name of a person as the reputed father of a bastard child, knowing that he has been acquitted of that charge, is held, in *Kubricht v. State* (Tex.), 58 L. R. A. 959, to be guilty of libel.

**CRIMINAL PRACTICE—FORMER JEOPARDY—DISCHARGE OF JURY.**—The discharge of a jury in a criminal case without the consent of the accused, because the jurors are unable to agree, is held, in *Dreyer v. People* (Ill.), 58 L. R. A. 869, not to sustain the defense of former jeopardy, on a subsequent trial.

**PUNITIVE DAMAGES—WRONGFUL REFUSAL BY BANK TO HONOR CHECK OF DEPOSITOR.**—Punitive damages for wrongful refusal to honor a check are held, in *American Nat. Bank v. Morey* (Ky.), 58 L. R. A. 956, not to be allowable, in the absence of actual malice, oppression, or bad motive on the part of the bank.

**LIMITATIONS—DEBT BARRED DOES NOT DEFEAT SPECIFIC LIEN.**—That a debt has become barred by the statute of limitations is held, in *Connecticut Mut. L. Ins. Co. v. Dunscomb* (Tenn.), 58 L. R. A. 694, not to defeat the creditor's right to enforce payment of a policy of insurance in his favor on the debtor's life.